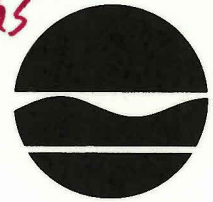


New York State Department of Environmental Conservation
50 Wolf Road, Albany, New York 12233

Rec'd
3/25



Thomas C. Jorling
Commissioner

SEP -6 PM 2:14

March 23, 1988

Mr. Herbert Mulholland
Chief
NY Compliance Section
U.S. Environmental Protection Agency
Region II
26 Federal Plaza
New York, NY 10278

RE: Handler: Conap
1405 Buffalo St.
Olean, NY 14760

EPA Identification Number: NYD096297544

Dear Mr. Mulholland:

On March 14, 1988, an compliance inspection was conducted at the above referenced handler. Enclosed, you will find a copy of the Inspection Forms pertaining to RCRA Land Restriction F-Solvent and California List Wastes.

These inspection forms are being sent to you since all enforcement activities relating to Land-Ban inspections are currently the responsibility of EPA.

Please contact Nelson Schnabel in our Region 9 Office at (716) 847-4585 if you have any questions. Also, please inform us of any proposed enforcement actions.

Sincerely,

John L. Middelkoop, P.E.
Chief
Compliance Inspection Section
Bureau of Hazardous Waste Operations
Division of Hazardous Substances Regulation

Enclosure

cc: w/o enc. - J. Lacey, Regional Attorney, Region 9
P. Buechi, Regional Solid & Hazardous Waste Engr., Region 9
N. Schnabel, Inspector, Region 9

RCRA LAND DISPOSAL RESTRICTION INSPECTION

RECEIVED

2-22-88

Facility: CONAP

U.S. EPA I.D. No.: NYD 096297544

Street: 1405 BUFFALO ST

City: OLEAN State: NY Zip Code: 14760

Telephone: 716-372-9650

Operator: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Owner: _____

Street: _____

City: _____ State: _____ Zip Code: _____

Telephone: _____

Inspection Date: 3/14/88 Time: 9³⁰ - 11^{AM} Weather Conditions: CLOUDY 35°=

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>NELSON SCHNABEL</u>	<u>NYSDOL</u>	<u>716-847-4585</u>

Facility Representatives: GEORGE KARPIN - ENVIRN. CO. ORD.

	<u>RCRA Status</u>	<u>F-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	<u>✓</u>	<u>✓</u>	_____
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	_____	_____	_____
Disposer	_____	_____	_____

INSPECTION SUMMARY

CONAP INC
1405 BUFFALO ST
OLEAN NY 14760
NYD 096297544

3/14/88

RCRA INSPECTION CONDUCTED 10/8/87

NO VIOLATIONS NOTED

CONAP MANUFACTURES VARIOUS AEROSPACE, DEFENSE,
COMPUTER PARTS FROM POLYURETHANE AND EPOXY RESINS.

N-METHYL PYRROLIDONE - F005 - IS USED FOR CLEANING

MEK - F005 - USED FOR CLEANING EQUIPMENT & TANKS

METHYLENE CHLORIDE - F001 - USED FOR DEGREASING AND
ALSO AS REACTION MEDIUM

TRICHLOROETHYLENE - F001 - USED FOR DEGREASING / CLEANING

RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	<u>F-Solvent Wastes</u>					
1.	F001	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
2.	F002	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
3.	F003	<u>✓</u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
4.	F004	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
5.	F005	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. California List Wastes *NA*

- Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Cadmium	100 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Chromium VI	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Lead	500 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Mercury	20 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Nickel	134 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Selenium	100 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>
Thallium	130 mg/L	<u> </u>	<u> </u>	<u> </u>	<u> </u>	<u> </u>

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. BDAT Treatability Group - Treatment Standards Identification

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

☒ Yes ☐ No ☐ NA

If yes, check the appropriate treatability group.

- ☐ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
☐ Pharmaceutical wastewater containing spent methylene chloride
☒ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste? *NR*

- a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less than 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

☐ Yes ☐ No ☐ NA

If yes, specify the method: _____

- b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761.60 (e))?

☐ Yes ☐ No ☐ NA

If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

B. Waste Analysis**1. F-Solvent Wastes**

- a. Does the generator determine whether the F-solvent waste exceeds treatment standards?

☒ Yes ☐ No ☐ NA

How was this determination made?

- Knowledge of waste

☒ Yes ☐ No

If yes, note how this is adequate: _____

- TCLP

☒ Yes ☐ No

If yes, provide the date of last test, the frequency of testing, and note any problems. Attach test results.

5/26/87

- b. Does the F-solvent waste exceed applicable treatability group treatment standards upon generation [268.7(a)(2)]?

☒ Yes ☐ No ☐ NA

If yes, specify the waste stream: _____

- c. Does the generator dilute the F-solvent waste as a substitute for adequate treatment [268.3]?

☐ Yes ☒ No ☐ NA

- d. How does the generator test F-solvent waste when a process or waste stream changes?

NA

2. California List Wastes NA

- a. Does the generator determine whether the waste is a liquid according to the Paint Filter Liquids Test (PFLT method 9095) as described by SW-846?

☐ Yes ☐ No ☐ NA

C. Management**1. On-Site Management**

Is waste that exceeds the treatment standards treated, stored, or disposed on-site?

_____ Yes ☒ No

If yes, the TSD Checklist must be completed.

2. Off-Site Management

- a. Does the generator ship any waste that exceeds the treatment standards to an off-site treatment or storage facility?

☒ Yes _____ No

If yes, does the generator provide notification to the treatment or storage facility [268.7(a)(1)]?

☒ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s) ☒ Yes _____ No

Applicable treatment standards ☒ Yes _____ No

Manifest number ☒ Yes _____ No

Waste analysis data, if available ☒ Yes _____ No

Identify off-site treatment or storage facilities: _____

- b. Does the generator ship any waste that meets the treatment standards to an off-site disposal facility?

_____ Yes ☒ No

If yes, does the generator provide notification and certification to the disposal facility [268.7(a)(2)]?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets treatment standards	_____ Yes	_____ No

Identify off-site land disposal facilities: _____

- c. If the waste is subject to a nationwide variance (e.g., solvent-water mixtures less than 1%), extension (268.5), or petition (268.6), does the generator provide notification to the off-site disposal facility that the waste is exempt from land disposal restrictions [268.7(a)(3)]?

_____ Yes _____ No _____ NA

D. Treatment Using RCRA 264/265 Exempt Units or Processes
 (i.e., boilers, furnaces, distillation units, wastewater treatment tanks, elementary neutralization, etc.)

Are treatment residuals generated from units or processes exempt under RCRA 264/265?

_____ ☒ Yes _____ No

If yes, list types of waste treatment units and processes:

_____ 150 GAL/DAY CONTINUOUS UNIT _____

Analysis Results
Report Number 052687001
Date: May 26, 1987

CLIENT I.D.	7062-E-C010	7062-E-A012	7504
Northeast Environmental Services, Inc.			
ULI I.D.	12787059	12787060	12787061
EP Toxicity Arsenic	--	--	<0.001
EP Toxicity Barium	--	--	0.6
EP Toxicity Cadmium	--	--	<0.005
EP Toxicity Chromium	--	--	<0.05
EP Toxicity Lead	--	--	<0.1
EP Toxicity Mercury	0.0056	0.040	<0.0004
EP Toxicity Selenium	--	--	<0.001
EP Toxicity Silver	--	--	<0.05

All results are expressed as ppm.

Approved: *Daniel R. [Signature]* HL

Date: 5/26/87

Disclaimer: The test results and procedures utilized, and laboratory interpretations of data obtained by ULI as contained in this report are believed by ULI to be accurate and reliable for sample(s) tested. In accepting this report, the customer agrees that the full extent of any and all liability for actual and consequential damages of ULI for the services performed shall be equal to the fee charged to the customer for the services as liquidated damages.